

## PRIVACY NOTICE

(pursuant to articles 13 and 14 of Regulation (eu) 2016/679)

### INTRODUCTION

**IO.T Solutions S.r.l.** ("IO.T"), in accordance with the applicable law, undertakes to process your personal data in accordance with the principles of lawfulness, fairness, transparency, pertinence and minimisation established by Article 5 of EU Regulation 2016/679 "on the protection of natural persons with regard to the processing of personal data ("GDPR").

IO.T invites you to read the following privacy notice drawn up pursuant to Articles 13 and 14 GDPR. This privacy notice is addressed to all users (the "**Data Subjects**"), who, as employees and/or collaborators of the company (the "**Customer**") make use of *Dina – Connecting Spaces* (the "**Platform**") by virtue of the contractual relationship existing between the Customer and IO.T (the "**Agreement**").

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### DATA CONTROLLER

**IO.T Solutions S.r.l.** is a Teoresi Group company with registered office in Via Perugia, 24, Turin, 10152, P.IVA 09723260965. The Customer acts as Data Controller, while IO.T acts as Data Processor of the personal data collected through the Platform.

The contact details of the Data Controller are: Tel. 011 240 8000; e-mail: [privacy@teoresigroup.com](mailto:privacy@teoresigroup.com) ; PEC: [iotsolutions@legalmail.it](mailto:iotsolutions@legalmail.it)

### CATEGORIES OF DATA PROCESSED

IO.T may process the following Data:

- Personal identification data: first name, last name, username
- Contact data: e-mail, telephone number (optional)
- IP address;
- Log

### PURPOSE AND LEGAL BASIS OF THE PROCESSING

The Data you provide will be used for the following purposes:

- a) Subscription to the Platform by filling in the form;
- b) Correct use of the services offered by the Platform;
- c) Sending reminder e-mails for information purposes regarding the upcoming deletion of the account due to inactivity (please read the paragraph entitled "Retention Period" of this Privacy Notice);
- d) Provision of training sessions;
- e) Improvement of the service quality.

The legal basis for the purposes (a), (b) and (d) is the execution of the contract. The legal basis for the purposes (c) and (e) is the legitimate interest.

### NATURE OF DATA PROVISION

The provision of your personal data is necessary for the proper performance of the service. Any refusal to provide such data will affect the correct use of the Platform.

### **PROCESSING METHODS**

Data will be processed and collected through paper-based instruments, computer and telematic media, also by entering them into databases, archives, platforms, suitable to ensure the security and confidentiality of the Data, in accordance with the provisions of art. 32) of the European Privacy Regulation UE/2016/679 (GDPR).

However, by carrying out the processing operations the minimum level of data protection required by law is ensured by adopting all technical, computer, organizational, logistical and procedural security measures needed, as provided for in Annex B of Legislative Decree no. 196/03.

Your Data will be processed only by expressly authorized staff.

### **DATA RECIPIENTS**

Your Personal Data may be shared by IO.T with the following subjects:

- all persons authorized to process the data by virtue of regulatory and/or judicial measures;
- to our collaborators, employees, authorized to process the data within the scope of their employment duties;
- Teoresi Group Companies;
- Third parties authorized to process the personal data for the purposes of technical support or for reasons anyway linked to the proper functioning of the Platform.

### **DATA RETENTION PERIOD**

Please note that, pursuant to art. 5 of the GDPR and thus in accordance with the principles of lawfulness, purpose limitation and data minimisation, your Data will be kept for the time necessary to achieve the purposes actually pursued. Specifically:

- without prejudice to different instructions provided by the Customer, maximum 30 days from the termination of the Agreement;
- maximum 30 days from the date either of the exercise of the right to erasure or of autonomous unsubscription by the user;
- 1 year from the last log-in date by the user (so-called inactivity period).

The personal data may be anonymized for statistical purposes.

### **DATA PROCESSOR**

Your personal data may also be processed by third parties, which, by virtue of their appointment as Data Processors pursuant to art. 28 of the Regulations, carry out on behalf of IO.T further activities linked to the business contractual relationship as well as to the proper functioning of the Platform.

### **RIGHTS OF DATA SUBJECT**

As a Data Subject, you may exercise the rights set forth in Art. 15 et seq. GDPR against IO.T, by sending a communication to [privacy@teoresigroup.com](mailto:privacy@teoresigroup.com). Your request will be processed by the Data Controller within 28 days.